

EXHIBIT J

From: Hill, Brian
Sent: Friday, November 12, 2010 4:27 PM
To: 'David J. Strachman'; Hibey, Richard; Rochon, Mark; 'Sherman, Deming'
Cc: 'Max Wistow'; 'Benjamin Ledsham'
Subject: RE: Ungar v. PA/PLO
Counsel,

Serving us with a list of eight expert witnesses and two expert "report[s]" (one of which has nothing to do with this case) with one week left in discovery is unacceptably late, inadequate, and severely prejudicial to Defendants.

We are willing to attempt to cure this prejudice by receiving your expert reports and deposing your experts before November 19, if you are willing to produce your expert reports by Monday November 15 at noon, and produce your witnesses for depositions in our offices in Washington next week.

Please let us know immediately if you will produce your expert reports for your witnesses (other than Dr. Brennan) by Monday at noon, and produce your experts for deposition in our offices prior to November 19.

Defendants are reserving all their rights and remedies for your late and inadequate disclosure of witnesses in this matter.

Regards,

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From: David J. Strachman [mailto:djs@mtlesq.com]
Sent: Friday, November 12, 2010 3:35 PM
To: Hill, Brian; Hibey, Richard; Rochon, Mark; 'Sherman, Deming'
Cc: 'Max Wistow'; 'Benjamin Ledsham'
Subject: Ungar v. PA/PLO

Counsel,

Please see attached.

Dave

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